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August 14, 2013

Mr. Brian Jones Senior Campaign Finance Analyst Federal Election Commission 999 E Street NW Washington, DC 20463

RE:Ohio Republican Party State Central & Executive Committee Identification No. C00162339

Dear Brian:

This correspondence is in response to your phone call of August 12, 2013 requiring a response by August 14, 2013, in regards to the debt reporting questions you raised.

- 1. The increase in debts on the reports cited was a result of a variety of factors. Upon completion of the FEC Audit in June, 2011, of the 2008 cycle, subsequent reports were reviewed internally to determine if debts were missed on additional reports. After all the reports noted in the audit that required amendment were amended on 6/7/11, the 2010 Oct Monthly and the 2010 12 Day Pre-General report were amended as well, on 6/9/11, to include debts. These reports were self-corrected and not as a result of an FEC RAI.
- 2.The 2010 30 Day Post-General was amended to include an invoice that was received by us several months after the invoice date. The invoice was disputed, and upon determination that it was accurate, the report was amended to include it on the proper report. This caused subsequent reports to be filed as amendments as well.
- 3. The 2010 Year End and the 2011 February monthly were amended due to an error in Levin reporting. The invoice was incorrectly paid completely, and reported completely from the Levin Fund. These reports were corrected to reflect where the information should have been reported originally, which caused an increase in both the debt and disbursements.
- 4. The invoices added to the debt schedule on the 2011 November monthly were not received by us until 2 months after the date of the invoice. These invoices were emailed and no record was found of them having been emailed by the vendor, or received by us on, or near, the date of the invoices. The vendor was asked to change the invoice dates, but this was not done. To include the invoices in the proper period, the report was amended to properly report the debt.
- 5. The additional debt added to the 2011 December monthly was a result of an invoice that was intended to be paid from the non-federal account, but instead was paid from the federal account. Upon payment it was determined that it should have been included in the debt schedule on the 2011 December monthly, and the report was amended to correctly reflect the invoice.
- 6. The invoices added to the 2012 July monthly report were initially billed to another entity. That entity did not forward the invoices to us until July 25th, and July 30th, 2013. Because the invoices were still made out to the other entity, there was confusion on who was actually responsible for the payment of these invoices. Upon confirmation they were added to this report as debt and it was amended to properly include them.

The Ohio GOP employee who prepares the reports is in contact frequently with our FEC analyst to determine the proper procedures for reporting in circumstances that are outside the normal course of business, such as receiving invoices long after the invoice date. She has followed the direction given by the analyst.

Please let me know if you have any additional questions, or need any additional information.

Sincerely,